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*Attorneys for Defendant NETFLIX, INC.*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

**Case No. 4:22-cv-01490-JST**

**PARTIES' JOINT STIPULATION AND  
~~PROPOSED~~ ORDER REGARDING  
 CASE SCHEDULE**

**[CIVIL LOCAL RULE 6-2]**

Judge: Hon. JON S. TIGAR

**TO THE HON. JON S. TIGAR, UNITED STATES DISTRICT JUDGE,  
NORTHERN DISTRICT OF CALIFORNIA:**

Pursuant to Civil Local Rule 6-2 of the Civil Local Rules (L.R.), Defendant Netflix, Inc. (“Defendant” or “Netflix”) and Lauri Valjakka (“Plaintiff” or “Valjakka”) stipulate as follows:

1. Netflix filed an unopposed administrative motion to extend the time to hold the Initial Case Management Conference from April 19, 2022 to May 3, 2022. (Dkt. 29, as granted Dkt. 32).

2. On May 18, 2022, the parties jointly submitted a proposed order for a two-week extension for Netflix to respond to the Second Amended Complaint. The Court granted the proposed order on May 20, 2022. (Dkt. 46, as granted Dkt. 47).

3. On September 2, 2022, the parties jointly stipulated to extend the time for Netflix to respond to Valjakka’s damages contentions, after Valjakka supplemented his damages on September 1, 2022. On December 27, 2022, the parties filed a Proposed Schedule pursuant to the Court’s March 30, 2022, Case Management Conference Order. (Dkt. 27) The Court granted the Order on January 9, 2023. (Dkt. 77).

4. On April 4, 2023, the parties jointly submitted a proposed order to extend time for mediation. The Court granted the proposed order on April 5, 2023. (Dkt. 94, as granted Dkt. 95).

5. On May 11, 2023, Valjakka submitted an unopposed motion to amend the case schedule to extend fact discovery. On May 18, 2023, the Court granted Valjakka’s motion. (Dkt. 96, as granted Dkt. 98).

6. On June 28, 2023, the parties jointly submitted a proposed order to extend time for Valjakka’s expert reports. The Court granted the proposed order on June 28, 2023. (Dkt. 110, as granted Dkt. 115).

7. On August 16, 2023, Valjakka served a Supplemental Report on damages. On August 17, 2023, the parties met and conferred regarding the schedule for rebuttal expert report briefing. Netflix requested, and Valjakka agreed to, an extension of the rebuttal expert report

1 deadline for Netflix until August 22, 2023. The requested time modification would extend the  
 2 dates for Netflix's Rebuttal Damages Report as shown in the table below and does not modify  
 3 any other deadlines in the Court's Scheduling Order.

4 8. On August 17, 2023, the parties met and conferred regarding cross-motions for  
 5 summary judgment, and agreed that Defendant Netflix will file the Opening Motion on  
 6 September 15, 2022.

7 9. Pursuant to Section I of the Court's Standing Order on Civil Cases, the parties agree  
 8 to the below briefing schedule, and respectfully request a hearing on or after November 30,  
 9 2023.

<b>Date</b>	<b>Revised Deadline</b>	<b>Description</b>
08/18/2023	08/22/23	Netflix Rebuttal Damages expert report due
09/08/2023		Close of expert discovery
09/22/2023	09/15/2023	Netflix's Opening Motion for Summary Judgment
9/22/2023	9/22/2023	Opening Daubert Motions
10/06/2023		Valjakka's Opening/Opposition Motion for Summary Judgment
10/13/2023	10/27/2023	Netflix's Opposition / Reply Motion for Summary Judgment
	11/09/2023	Valjakka's Reply Motion for Summary Judgment
11/02/2023	11/30/2023	Hearing on Summary Judgment/Daubert Motions
01/12/2024		Pretrial Conference
02/05/2024		Trial

1 Dated: August 21, 2023

Respectfully submitted,

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1 Dated: August 21, 2023

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12 ***Attorneys for Plaintiff***

13 **LAURI VALJAKKA**

1 **PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.**

2  
3  
4 Dated: August 22, 2023

By:   
HON. JON S. TIGAR  
UNITED STATES DISTRICT JUDGE